

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



EXTERNAL CIVIL RIGHTS COMPLIANCE OFFICE  
OFFICE OF GENERAL COUNSEL

July 6, 2022

**In Reply Refer to:**

EPA Complaint No. 01R-22-R4

Shea D. Johnson  
Director, Georgia Operations  
U.S. Department of Housing and Urban Development  
40 Marietta Street NW  
Atlanta, GA 30303  
Shea.D.Johnson@hud.gov

**Re: Referral of Administrative Complaint**

Dear Ms. Johnson:

The U.S. Environmental Protection Agency (EPA), External Civil Rights Compliance Office (ECRCO) received a complaint on October 13, 2021, from William Smith, President of the Nob Hill HOA (Complainant). Complainant alleges that the City of Conyers (City), Rockdale County, GA (County) and the Georgia Department of Natural Resources (DNR)<sup>1</sup> discriminated on the basis of race in violation of Title VI of the Civil Rights Act of 1964 and EPA's implementing regulations at 40 C.F.R. Part 7 against the predominantly African American residents of the Nob Hill community. Specifically, the complaint alleges the City discriminated in conducting the annexation of unincorporated parcels of County property by the City that will create major disruptions and pose a threat to their health, well-being, and quality of life through increased demand on municipal services such as the sewers, traffic, and noise. The complaint also alleges the City took these actions without providing the Nob Hill residents a meaningful opportunity to participate, which left the residents with no recourse to influence the City's zoning and annexation decision.

After careful consideration, ECRCO has found that the City is not a recipient of, or applicant for financial assistance from EPA. Therefore, ECRCO must reject and close this complaint as of the date of this letter. ECRCO's research shows that the City may be receiving financial assistance from the U.S. Department of Housing and Urban Development (HUD). Therefore, ECRCO is referring this complaint to your office for appropriate action.

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<sup>1</sup>The complaint against the County and DNR are still under jurisdictional review by ECRCO.

We have notified the Complainant that EPA has referred this complaint to HUD and provided your contact information. We have also notified the City of EPA's rejection and closure of this complaint. We enclose copies of our rejection letters to the City and the Complainant as well as the original complaint. If you have any questions, please contact me at [dorka.lilian@epa.gov](mailto:dorka.lilian@epa.gov), or ECRCO's Acting Deputy Director, Anhthu Hoang at [hoang.anhthu@epa.gov](mailto:hoang.anhthu@epa.gov).

Sincerely,



Lilian S. Dorka, Director  
External Civil Rights Compliance Office  
Office of General Counsel

Enclosures

cc: Ariadne Goerke  
Deputy Associate General Counsel  
Civil Rights & Finance Law Office

Fred Thompson  
Acting Deputy Regional Administrator  
Acting Deputy Civil Rights Official  
EPA Region 4

Leif Palmer  
Regional Counsel  
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